

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BREAKING MEDIA INC.  
dba ABOVE THE LAW,

Petitioner,

-against-

EVAN P. JOWERS,

Respondent.

Re: Subpoena Issued in,  
*MWK Recruiting, Inc. v.*  
*Evan P. Jowers, et al*  
U.S. District Court  
Western District of Texas

Misc No.1: 21-mc-00194-KPF

Associated Case: 1:18-cv-00444  
(W.D.TX)

**DECLARATION OF ROBERT  
TAULER IN SUPPORT OF  
OPPOSITION TO MOTION TO  
QUASH**

**ROBERT TAULER** hereby declares pursuant to 28 U.S.C. §1746:

1. I am a partner in the law firm of Tauler Smith LLP, attorneys for Respondent Evan P. Jowers (“Jowers”).
2. I make this Declaration in support of Jowers’s Opposition to Petitioner Breaking Media, Inc.’s (“Breaking Media”) Motion to Quash Non-Party Subpoena.
3. Attached hereto as **Exhibit A** is a true and correct copy of an article titled “Judge Writes, ‘To Say That This Case Is Trouble Is Like Saying 2020 Has Been Difficult,’” published by Above The Law on December 22, 2020.
4. Attached hereto as **Exhibit B** is a true and correct copy of MWK Entities’ Objections and Responses to Defendant/Counterclaimant’s First Requests for Production, dated February 4, 2020, in the matter of *MWK Recruiting, Inc., v. Evan P. Jowers, et al.* (WD Tex. 1:18-cv-00444).

I affirm the truth of the statements herein under penalty of perjury.

/s/ Robert Tauler  
Robert Tauler

Dated: March 11, 2021  
Los Angeles, California